

**I. Tribal Area Broadband Support**

- NTTA appreciates the steps taken in the December 2018 Rate-of-Return carrier Universal Service Fund budget order to increase the overall budget for small carrier universal service support programs.
- While the FCC did adopt a Tribal Broadband Factor (TBF) in relation to new offers of cost model-based support, nothing was adopted for those carriers remaining subject to legacy support mechanisms.
- The FCC has requested another round of comments on a TBF for the legacy support mechanisms as proposed by NTTA. It is vital that the FCC act on the legacy support mechanism TBF quickly in order to give carriers serving Tribal lands the best opportunity possible to close the digital divide that exists between rural Tribal areas and the rest of the country.

**II. Broadband Mapping**

- Accuracy problems with Form 477
- According to the GAO, the data collected by the FCC does “not accurately or completely capture broadband access on tribal lands.” (Report GAO-18-630)
- Current efforts being undertaken by the industry to improve accuracy

**III. Infrastructure**

- While the broadband mapping issues mentioned above are very important, the need for mapping of other facilities such as water, sewer, electric and gas on Tribal lands is needed.
- Many Tribally-owned communications companies have experienced unwanted, expensive and dangerous damage to existing infrastructure while deploying broadband.
- NTTA proposes a pilot program for locating current infrastructure in Native communities.
- NTTA also wants to highlight the need for the enhancement and Tribal availability to the Rural Utility Service’s REConnect and Community Connect programs.

**IV. 5G / Spectrum**

- Continuing need for better access to fiber networks and spectrum for Tribal areas.
- Additional funding for the development of more robust middle mile infrastructure and capacity is requested.
- There is a need for affordable and properly scaled spectrum access for Tribal areas.
- Much like current issues with spectrum and fiber networks, policy makers must make sure that the evolution of 5G technology and networks include Tribal areas and communities.
- Robust and affordable wired and wireless connectivity needs to be prioritized for Native communities.

**V. Sovereignty**

- The recognition of Tribal sovereignty remains an important issue.
- Proper access and construction in Tribal areas must be adhered to.
- Tower siting by wireless providers is an ongoing problem.
- With the advent of 5G technology, Tribal sovereignty must be dealt with in a historic and legal manner.